

COMMENTS RELATIVE TO FCC NOI 03-104 (BPL)

I wish to submit comments on Broadband over Power Lines (BPL) from the standpoint of both an active amateur radio operator and as an individual who has been employed professionally in the telecommunications industry for most of my working career.

As I understand the BPL proposal, the existing electrical power distribution infrastructure would be used to transmit broadband telecommunications services to business and residential customers. The proposed BPL service would utilize transmissions that are in the HF radio spectrum. This immediately raises concerns relative to the potential for interference between BPL and licensed radio services.

As an amateur radio operator, one of my primary interests is the reception of extremely weak signals in the HF radio spectrum. Studies have shown that it would be technically difficult to prevent BPL signals from radiating from overhead power transmission lines. Any unintentional radiation would raise the ambient radio noise floor, rendering weak signal reception more difficult.

As a telecommunications professional, I have been tasked to deliver error free digital communications service to the end subscriber. Normal transmission facilities such as copper loop or lightwave systems are intrinsically immune to local RF fields from nearby radio transmitters. However, it remains to be demonstrated how BPL systems will cope with local RF fields in the same or adjacent frequency spectrum.

I foresee the potential for significant interference to BPL subscribers from nearby licensed commercial and amateur radio service transmitters. The routing of overhead power transmission lines through industrial and residential areas would subject BPL systems to strong RF fields. The end subscriber receiving transmission errors will not understand why his telecommunications system was failing, but would insist on trouble resolution. This would impose unnecessary burden on commission licensees.

My desire is that the Commission will evaluate the interference potential of the proposed BPL service. It is my opinion that our nation already has sufficient diversity in telecommunications delivery systems and that the implementation of BPL is not warranted.

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